

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

ORLANDO BROWN,

Plaintiff,

v.

H&P CAPITAL, INC.,

Defendant.

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CIVIL ACTION NO.

1:12-CV-00466-WS-B

MOTION TO WITHDRAW

COME NOW L. Jackson Young, Jr. and the law firm of Ferguson Frost & Dodson, LLP, attorneys for Defendant H & P Capital, Inc. ("H&P"), and move the Court for an order granting them leave to withdraw as counsel for H&P. This motion is based on the declaration of L. Jackson Young, Jr., set forth below.

WHEREFORE, PREMISES CONSIDERED, L. Jackson Young, Jr. and the law firm of Ferguson Frost & Dodson, LLP respectfully request that the Court enter an Order granting them a withdrawal as counsel for H&P.

DATED this 6th day of March 2013.

Respectfully submitted,

Ferguson Frost & Dodson, LLP

/s/ L. Jackson Young, Jr.

L. Jackson Young, Jr. (ASB-7946-G65L)

Counsel for Defendant H&P Capital, Inc.

OF COUNSEL:

FERGUSON FROST & DODSON, LLP

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DECLARATION

I, L. Jackson Young, Jr., under penalty of perjury under the laws of the State of Alabama, declare and state as follows:

1. My name is L. Jackson Young, Jr. I am currently representing H & P Capital, Inc. in this matter.
2. An issue has arisen between the undersigned and H&P that adversely affects, both professionally and economically, the relationship between the undersigned and H&P.
3. Thus, due to the irreconcilable differences which have arisen between the undersigned and H&P, the undersigned will be unable to effectively and properly continue representing H&P herein and requiring the same would not be in the best interests of H&P.
4. Without waiver of and expressly reserving the attorney-client privilege, the undersigned communicated to H&P that he would file this motion by this date. As of the filing of this motion, the undersigned has received no response from H&P.
5. This motion has been served upon opposing parties via ECF as well as H&P via first-class U.S. mail.

EXECUTED at Birmingham, Alabama, on this 6th day of March, 2013.

/s/ L. Jackson Young, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following persons:

Michael Brandon Walker, Esq.
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Counsel for Plaintiff

Mr. Noel Pooler
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/s/ L. Jackson Young, Jr.

Of Counsel